

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

JAPAN DISPLAY INC. and PANASONIC  
LIQUID CRYSTAL DISPLAY CO., LTD.,

Plaintiffs,

v.

TIANMA MICROELECTRONICS CO.  
LTD.,

Defendant.

CIVIL ACTION NO. 2:20-cv-00283-JRG  
(Lead Case)

CIVIL ACTION NO. 2:20-cv-00284-JRG

CIVIL ACTION NO. 2:20-cv-00285-JRG

(Consolidated)

JURY TRIAL DEMANDED

**DECLARATION OF AIDAN C. SKOYLES IN SUPPORT OF DEFENDANT'S  
MOTION TO COMPEL PLAINTIFFS TO PRODUCE  
RELEVANT INFORMATION IN PLAINTIFFS' SOLE POSSESSION**

I, Aidan C. Skoyles, hereby declare under penalty of perjury that, to the best of my knowledge, the following statements are true and correct:

1. I am an attorney with Finnegan, Henderson, Farabow, Garrett & Dunner LLP and counsel to Defendant Tianma Microelectronics Co. Ltd. in the above-captioned litigations. I submit this declaration in support of Defendant's Motion to Compel Plaintiffs to Produce Relevant Information in Plaintiffs' Sole Possession.

2. I have personal knowledge of the facts provided in this declaration and can and will testify competently to them if called upon to do so.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an excerpt of Defendant's Letter to Plaintiffs Regarding Plaintiffs' Discovery Deficiencies, dated May 14, 2021 (highlights added). In the letter, Tianma Microelectronics identified specific deficiencies in the disclosures and production Plaintiffs had provided in response to the discovery requests Tianma Microelectronics served on March 17, 2021.

4. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt of Plaintiffs' Letter to Defendant Regarding Plaintiffs' Discovery Deficiencies, dated May 28, 2021 (highlights added).

5. Due to the page-limitation set forth in the Discovery Order, Tianma Microelectronics provided the above excerpts. If the remaining portions of the above-identified documents or other documents would aid in the Court's consideration, Tianma Microelectronics will submit promptly.

6. Plaintiffs filed their Complaints in August 2020 in the above-captioned litigations. By May 14, 2021, the two Plaintiffs produced 137 documents. After several follow-up requests regarding Plaintiffs' discovery deficiencies, Plaintiffs provided another 67 documents on May 24, 2021. Plaintiffs have not produced any other documents.

7. Among the 204 documents Plaintiffs have produced to date, 200 are from Plaintiff Japan Display Inc., and the remaining four documents from Plaintiff Panasonic Liquid Crystal Display Co. Ltd.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of June 2021, in Washington, D.C.

By: /s/ Aidan C. Skoyles  
Aidan C. Skoyles